

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF TEXAS
MIDLAND-ODESSA DIVISION**

CONTIQUE WILLCOT,

Plaintiff,

V.

**SECURITIES & EXCHANGE
COMMISSION, GTS SECURITIES
LLC, ARI RUBINSTEIN, NEXT
BRIDGE HYDROCARBONS, INC.,
JOHN BRDA, GREGORY MCCABE,
FINANCIAL INDUSTRY
REGULATORY AUTHORITY**

Defendants.

CASE NO. 24-cv-00317-DC-RCG

**AGREED MOTION FOR EXTENSION OF TIME TO RESPOND
TO PLAINTIFF'S AMENDED COMPLAINT**

Pursuant to Rule 6(b) of the Federal Rules of Civil Procedure (“FRCP”), Defendant Gregory McCabe (“McCabe”) requests a 45-day extension of time to May 8, 2025, to respond to Plaintiff’s Amended Complaint (ECF 3).

In support of this motion, McCabe states as follows:

1. This motion is McCabe's first request for an extension of time with respect to this response deadline.
2. Counsel for McCabe has conferred with pro se Plaintiff, Contique Willcot, via email, and he agreed to the requested extension of the deadline to respond to Plaintiff's Amended Complaint to May 8, 2025. Defendant Securities & Exchange Commission is the only other party to appear in this Case as of the date of this filing.

3. McCabe requests the additional time to prepare his response to Plaintiff's Amended Complaint because of its breadth. The Amended Complaint, served on March 3, 2025, is 78 pages with 285 numbered paragraphs and/or allegations, contains 8 separate counts, and seeks declaratory and injunctive relief on a multitude of statutory and constitutional bases.

WHEREFORE, McCabe respectfully moves for an extension of time from March 24, 2025, to and including May 8, 2025, to move to dismiss or otherwise respond to the Second Amended Complaint.

Respectfully submitted,

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**ATTORNEYS FOR DEFENDANT
GREG MCCABE**

CERTIFICATE OF SERVICE

I hereby certify that on this 21st day of March 2025, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to:

Contique Willcot
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